

BART H. WILLIAMS (State Bar No. 134009)
bart.williams@mto.com
MANUEL F. CACHÁN (State Bar No. 216987)
manuel.cachan@mto.com
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue
Thirty-Fifth Floor
Los Angeles, California 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

DAVID H. FRY (State Bar No. 189276)
david.fry@mto.com
JESLYN MILLER (State Bar No. 274701)
jeslyn.miller@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street
Twenty-Seventh Floor
San Francisco, California 94105-2907
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Attorneys for Defendants, WELLS FARGO &
COMPANY and WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHAHRIAR JABBARI and KAYLEE
HEFFELFINGER, on behalf of themselves
and all others similarly situated,

Plaintiffs,

vs.

WELLS FARGO & COMPANY and WELLS
FARGO BANK, N.A.,

Defendants.

Case No. 15-CV-02159 VC

**STIPULATION REGARDING BRIEFING
SCHEDULE FOR MOTION TO DISMISS
THE CONSOLIDATED AMENDED
COMPLAINT AND ORDER**

Judge: Hon. Vince Chhabria
Ctrm.: 4

Action Filed: May 13, 2015

1 This Stipulation is made by and between Plaintiffs Shahriar Jabbari and Kaylee
2 Heffelfinger, on the one hand, and Defendants Wells Fargo Bank, N.A. and Wells Fargo &
3 Company, on the other, as follows:

4 WHEREAS, Defendants were served with the summons and complaint in this action on or
5 about May 19, 2015;

6 WHEREAS, Defendants filed a motion to dismiss the complaint on July 9, 2015 (Dkt.
7 No. 31);

8 WHEREAS, Plaintiffs filed a Consolidated Amended Complaint pursuant to Federal Rule
9 of Civil Procedure 15(a) on July 30, 2015 (Dkt. No. 37), thereby rendering Defendants' motion to
10 dismiss moot;

11 WHEREAS, at the Case Management Conference on August 11, 2015, the Court
12 requested that the parties enter a briefing schedule for the motion to dismiss filings;

13 WHEREAS, counsel for Plaintiffs and counsel for Defendants have accordingly agreed
14 that, subject to any modification approved by the Court after review of the moving papers or
15 opposition papers, Defendants' motion to dismiss the Consolidated Amended complaint will be
16 filed not later than September 8, 2015, any opposition will be filed not later than October 7, 2015,
17 any reply will be filed not later than October 21, 2015, and such motion will be set for hearing on
18 November 19, 2015.¹

19 NOW, THEREFORE, Plaintiffs and Defendants, through their respective counsel of
20 record, hereby stipulate that:

21 (i) Defendants shall have through and including September 8, 2015 to file a motion to
22 dismiss the Consolidated Amended Complaint;

23 (ii) Plaintiffs shall have through and including October 7, 2015 to file their opposition to
24 the motion to dismiss;

25 (iii) Defendants shall have through and including October 21, 2015 to file any reply brief
26 in support of any motion to dismiss; and

27 ¹ After conferring, the parties jointly propose a November 19 hearing date because defense
28 counsel has a conflict on November 12.

(iv) any motion to dismiss the Consolidated Amended Complaint will be noticed for hearing on November 19, 2015.

DATED: August 13, 2015

MUNGER, TOLLES & OLSON LLP

By: /s/ David H. Fry
David H. Fry

Attorneys for Defendants,
Wells Fargo Bank, N.A. and Wells Fargo &
Company

DATED: August 13, 2015

KELLER ROHRBACK, L.L.P.

By: /s/ Matthew J. Preusch

Matthew J. Preusch (Bar No. 298144)
Khesraw Karmand (Bar No. 280272)
1129 State Street, Suite 8
Santa Barbara, CA 93101
Tel: (805) 456-1496
Fax: (805) 456-1497
mpreusch@kellerrohrback.com
kkarmand@kellerrohrback.com

Gretchen Freeman Cappio, *admitted pro hac vice*
Daniel P. Mensher, *admitted pro hac vice*
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101-3052
Tel: (206) 623-1900
Fax: (206) 623-3384
gcappio@kellerrohrback.com
dmensher@kellerrohrback.com

Attorneys for Plaintiffs,
Shahriar Jabbari and Kaylee Heffelfinger

DATE: August 14, 2015

